

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JASON SHURB

§
§ Case No.:4:13-cv-271

Plaintiff,

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V.

§

THE UNIVERSITY OF TEXAS HEALTH
SCIENCE CENTER AT HOUSTON-SCHOOL
OF MEDICINE, et al.

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Defendants.

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO STATE
DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT**

TO THE HONORABLE KENNETH M. HOYT:

NOWS COME Plaintiff, JASON SHURB, filing this, Plaintiff's Unopposed Motion for Extension of Time to Respond to State Defendants' Motion to Dismiss Plaintiff's Amended Complaint, showing unto this honorable Court as follows:

I.

State Defendants filed their Motion to Dismiss Plaintiff's Amended Complaint on April 22, 2013. Pursuant to Local Rule 7.3, Plaintiffs' response would be due on May 13, 2013.

II.

Plaintiff's counsel is experiencing some unexpected IT problems which made it impossible to complete his Response to State Defendants' Motion to Dismiss Plaintiff's Amended Complaint.

III.

Plaintiff's request a two (2) day extension up to and including May 15, 2013 to file his
Respond to State Defendants' Motion to Dismiss Plaintiff's Amended Complaint.

IV.

The undersigned counsel has contacted opposing counsel for State Defendants and counsel for Defendant, The Methodist Hospital, and they are unopposed to Plaintiff's request for a two (2) day extension.

WHEREFORE, Plaintiff requests that the Court grant this Motion for Extension of Time to Respond to State Defendants' Motion to Dismiss Plaintiff's Amended Complaint until May 15, 2013.

Respectfully submitted:

/s/ Jason J. Bach
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Attorney in Charge for Plaintiff

CERTIFICATE OF CONFERENCE

This is to certify that on May 13, 2013 a conference was held with counsel for Defendants regarding the relief requested in this motion. Darren G. Gibson, counsel for State Defendants, and Dwight W. Scott, Jr., counsel for Defendant, The Methodist Hospital, do not oppose the relief requested.

s/ Jason J. Bach
JASON J. BACH

NOTICE OF ELECTRONIC FILING

The undersigned counsel hereby certifies that he has electronically submitted for filing a true and correct copy of the above and foregoing in accordance with the Electronic Case Files System of the Southern District of Texas on the 13th day of May, 2013.

s/ Jason J. Bach
JASON J. BACH

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of May, 2013, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Southern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means:

Darren G. Gibson
Attorney-in-charge
Assistant Attorney General
Office of the Attorney General
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s/ Jason J. Bach
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